

RECEIVEDIN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

AUG 23 2022

FLORENCE, S.C.

UNITED STATES OF AMERICA)	CR. NO.: <u>7:22cr506 DCC</u>
)	18 U.S.C. § 922(g)(1)
)	18 U.S.C. § 924(a)(2)
)	18 U.S.C. § 924(c)(1)(A)(i)
)	18 U.S.C. § 924(e)
)	18 U.S.C. § 924(d)(1)
vs.)	21 U.S.C. § 841(a)(1)
)	21 U.S.C. § 841(b)(1)(A)
)	21 U.S.C. § 841(b)(1)(B)
)	21 U.S.C. § 846
)	21 U.S.C. § 853
)	21 U.S.C. § 881
)	28 U.S.C. § 2461(c)
LONNELL NORVELL CHAMBLEE, a/k/a “Donk”)	
)	<u>SUPERSEDING INDICTMENT</u>

COUNT 1

THE GRAND JURY CHARGES:

That on or about February 16, 2022, in the District of South Carolina, the Defendant, LONNELL NORVELL CHAMBLEE, a/k/a “Donk,” knowingly, intentionally and unlawfully did possess with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propenamide (commonly known as “fentanyl”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That on or about February 16, 2022, in the District of South Carolina, the Defendant, LONNELL NORVELL CHAMBLEE, a/k/a “Donk,” knowingly possessed a firearm and ammunition in and affecting commerce, to wit, a Fabrique Nationale (FN), model Five-Seven, 5.7x28mm pistol and 5.7x28mm ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

That on or about February 16, 2022, in the District of South Carolina, the Defendant, LONNELL NORVELL CHAMBLEE, a/k/a “Donk,” knowingly did possess a firearm in furtherance of a drug trafficking crime as alleged in Count 1, which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 4

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but beginning at least in or around January of 2020, and continuing thereafter, up to and including February 16, 2022, in the District of South Carolina, the Defendant, LONNELL NORVELL CHAMBLEE, a/k/a “Donk,” and others both known and unknown to the Grand Jury, knowingly and intentionally did combine, conspire, and agree and have tacit understanding with each other and with others, to knowingly, intentionally and unlawfully possess with intent to distribute and to distribute methamphetamine, a mixture or substance containing a detectable amount of methamphetamine, and a mixture or substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide (commonly known as “fentanyl”), all Schedule II controlled substances:

- a. With respect to the Defendant, LONNELL NORVELL CHAMBLEE, a/k/a “Donk,” the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 50 grams or more of methamphetamine, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, and 400 grams or more of a mixture or substance containing a detectable amount of N-Phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]propanamide (commonly known as “fentanyl”), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

All in violation of Title 21, United States Code, Section 846.

FORFEITURE**DRUGS/ FIREARM OFFENSES:**

Upon conviction for felony violation of Title 18 and 21, United States Code as charged in this Superseding Indictment, the Defendant, LONNELL NORVELL CHAMBLEE, a/k/a “Donk,” shall forfeit to the United States all of the Defendant’s rights, title, and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the Defendant obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code;
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
 - (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
 - (2) involved in or used in any knowing violations of 18 U.S.C. §§ 922 or 924, or violation of any other criminal law of the United States, or intended to be used in a crime of violence;

PROPERTY:

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendant for the offenses charged in this Superseding Indictment includes, but is not limited to, the following:

- (a) Firearm:

Fabrique Nationale (FN), model Five-Seven, 5.7x28mm pistol
Serial Number: 386394699

(b) Ammunition:

Miscellaneous rounds of 5.7x28mm ammunition

(c) Proceeds/ Forfeiture Judgment:

A sum of money equal to all property the Defendant obtained as a result of the drug offenses charged in the Superseding Indictment, and all interest and proceeds traceable thereto as a result for his violations of 21 U.S.C. §§ 841 and 846.

(d) Vehicle:

2015 Mercedes Benz S550

VIN#: WDDUG8CB5FA180724

Seized from: Lonnell Novell Chamblee on 2/16/22

Asset ID: 22-DEA-690297

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty.

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of Defendant up to an amount equivalent to the value of the above-described forfeitable property.

Pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

A True BILL



FOREPERSON

ADAIR F. BOROUGH
UNITED STATES ATTORNEY

By: The signature is handwritten in blue ink and appears to read "Christopher B. Schoen".
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